

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**DECOTIIS, FITZPATRICK & COLE, LLP**

Glenpointe Centre West  
500 Frank W. Burr Blvd., Suite 31  
Teaneck, New Jersey 07666  
(201) 928-1100 (Phone)  
(201) 928-0588 (Facsimile)  
[rpassamano@decotiislaw.com](mailto:rpassamano@decotiislaw.com)  
Russell J. Passamano, Esq.  
Attorneys for the City of Atlantic City

In re:

Revel AC, Inc., et al.,

Debtors.

Chapter 11

Case No. 14-22654(GMB)

**NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

**TO: All Parties in Interest**

**PLEASE TAKE NOTICE** that the City of Atlantic City, by and through its attorneys, DeCotis, FitzPatrick & Cole, LLP, shall move before the Honorable Gloria Burns, Chief, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of New Jersey, 400 Cooper Street, Camden, New Jersey 08101 on October 7, 2014, at 10:00 a.m., for the entry of an Order for Relief from the Automatic Stay so as to be permitted to sell a Tax Certificate, and for such other and further relief as the Court deems to be appropriate.

**PLEASE TAKE FURTHER NOTICE** that at the hearing on this Motion, the undersigned shall rely upon the supporting Declaration of Michael P. Stinson and Brief, both of which are filed herewith, and on oral argument of counsel.

**PLEASE TAKE FURTHER NOTICE** that responsive pleadings must be filed with the Court and served upon the undersigned no later than seven days before the return date, or at such other time as may be directed by the Court.

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service is filed herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order has been submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that the movant requests oral argument.

**DECOTIS, FITZPATRICK & COLE, LLP**  
Attorneys for the City of Atlantic City

By: /s/ Russell J. Passamano  
Russell J. Passamano

Dated: September 12, 2014